

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:) Case No.: 24-43233-357
) Honorable Brian C. Walsh
URBAN CHESTNUT BREWING COMPANY, INC.) Chapter 11 Proceeding
) Hearing Date: June 4, 2025
EIN - 27-1324055) Hearing Time: 11:00 a.m.
Debtor.) Location: Courtroom 5 North
)
) Spencer P. Desai, Esq.
) Desai Law Firm LLC
) 13321 North Outer Forty Rd., Suite 300
) St. Louis, Missouri 63017
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**DEBTOR'S RESPONSE TO UNITED STATES TRUSTEE'S SECOND MOTION TO
DISMISS OR CONVERT**

COMES NOW Debtor Urban Chestnut Brewing Company, Inc. (“Debtor”), by and through the undersigned counsel, and for its Response to the United States Trustee’s Second Motion to Dismiss or Convert (“Motion”), states to the Court as follows:

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor admits the allegations contained in paragraph 2 of the Motion.
3. Debtor admits the statutory reference in paragraph 3 of the Motion is accurate.
4. Debtor admits the statutory reference in paragraph 4 of the Motion is accurate.
5. Debtor admits the citation in paragraph 5 of the Motion is accurate.
6. Debtor admits the allegations contained in paragraph 6 of the Motion.
7. Debtor admits the allegations contained in paragraph 7 of the Motion.
8. Debtor admits the allegations contained in paragraph 8 of the Motion.
9. Debtor denies the allegations contained in paragraph 9 of the Motion.

10. Debtor denies the allegations contained in paragraph 10 of the Motion.
11. Debtor denies the allegations contained in paragraph 11 of the Motion.
12. Debtor denies the allegations contained in paragraph 12 of the Motion.
13. Further answering, the Debtor states that the January through April monthly operating reports have been filed.

WHEREFORE, Debtor prays this Court make and enter its Order denying the United States Trustee's Motion and further relief as this Court deems just and proper.

Dated: June 2, 2025

Respectfully submitted,

THE DESAI LAW FIRM, LLC

By: /s/ Spencer P. Desai
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Counsel for the Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies on the 2nd day of June, 2025, that a true and correct copy of the above and foregoing pleading was served by electronic filing in the CM/ECF system of the United States Bankruptcy Court for the Eastern District of Missouri which will send notification of such filing to the registered parties in interest and by first class mail, postage pre-paid, to the following:

Office of the United States Trustee 111 South 10 th Street, Room 6.353 St. Louis, Missouri 63102	Joshua M. Jones U.S. Attorney's Office 111 S. 10 th Street, Suite 20.333 St. Louis, Missouri 63102
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/s/ Spencer P. Desai